



J. TYLER McCaULEY
AUDITOR-CONTROLLER

**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 525
LOS ANGELES, CALIFORNIA 90012-2766
PHONE: (213) 974-8301 FAX: (213) 626-5427

December 20, 2004

TO: Supervisor Gloria Molina, Chair
Supervisor Yvonne B. Burke
Supervisor Zev Yaroslavsky
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: J. Tyler McCauley *Maria Oms*
Auditor-Controller *for*

SUBJECT: **THE HELP GROUP CONTRACT REVIEW**

We have completed a contract compliance review of The Help Group (Agency), a Department of Mental Health Services (DMH) service provider. It included a review of the Agency's billings to DMH for December 2003 and January 2004. This review is part of the Auditor-Controller's Centralized Contract Monitoring Pilot Project.

Background

The Department of Mental Health (DMH) contracts with The Help Group, a private, non-profit, community-based organization, which provides services to children and their parent(s) who reside in Mental Health Service Planning Areas (SPAs) Two and Five. Services include interviewing program participants, assessing their mental health needs, and developing and implementing a treatment plan. Our review focused on the Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) service, which is Medi-Cal's comprehensive and preventive child health program for individuals under the age of 21. At The Help Group, the EPSDT billable services include Mental Health Services, Medication Support Services, Case Management (Brokerage), Day Rehabilitation, and Day Treatment. The Help Group's headquarters is located in the Third District.

For our review period, DMH paid The Help Group \$113.87 for each day and \$72.18 for each half-day that a client participated in its Day Rehabilitation program. DMH paid \$122.00 for each half-day that a client participated in its Day Treatment program. DMH also paid between \$1.75 and \$4.22 per minute of staff time (\$105.00 and \$253.20 per hour) for other services. For Fiscal Year 2003-04, DMH paid The Help Group approximately \$5.8 million in EPSDT funds.

"To Enrich Lives Through Effective and Caring Service"

Purpose/Methodology

The purpose of the review was to determine whether The Help Group was providing the services outlined in their contract with the County. We also evaluated whether the Agency achieved planned service and staffing levels. Our monitoring visit included a review of a sample of The Help Group's billings, participant files, and personnel and payroll records. We also interviewed staff from The Help Group and interviewed a sample of the participants' parents or legal guardians.

Results of Review

Overall, The Help Group is providing the services outlined in the County contract. The Help Group used qualified staff to perform the services, and the participants' parents or legal guardians interviewed stated the program services met their expectations. We also determined that participants were eligible to receive services.

However, for 1,697 (14%) of the 12,344 service minutes sampled, The Help Group over billed DMH. For 1,367 of the 1,697 minutes, The Help Group staff overstated service minutes in the billing system. For the remaining 330 minutes, The Help Group billed DMH for services that the County contract does not allow. The amount that The Help Group over billed DMH totaled \$3,689. The Help Group subsequently submitted a correcting adjustment to DMH for the inappropriate billings.

In addition, The Help Group did not maintain sufficient documentation for 5,487 (44%) of the 12,344 service minutes sampled, for all of the 15 half-days of services sampled, and for six (60%) of the 10 full-days of services sampled. The amount of services that The Help Group did not sufficiently document totaled \$15,800.

We recommend that The Help Group management implement controls to detect and correct data entry errors that may result in billing DMH incorrect amounts. In addition, we recommend that The Help Group management maintain proper documentation to support the services billed to DMH. We have attached the details of our contract compliance review, along with recommendations for corrective action.

Review of Report

On October 5, 2004, we discussed the results of our review with The Help Group. In their attached response, The Help Group generally agrees with the findings and recommendations in our report.

We thank The Help Group management for their cooperation and assistance during this review. Please call me if you have any questions, or your staff may contact Don Chadwick at (626) 293-1102.

JTM:MMO:DC

Attachment

c: David E. Janssen, Chief Administrative Officer
Department of Mental Health
Dr. Marvin J. Southard, Director
Susan Kerr, Chief Deputy Director
John Hatakeyama, Deputy Director, Children's System of Care
Dr. Barbara Firestone, President and CEO, The Help Group
Violet Varona-Lukens, Executive Officer
Public Information Office
Audit Committee

**CENTRALIZED CONTRACT MONITORING PILOT PROJECT
EARLY AND PERIODIC SCREENING, DIAGNOSTIC, AND TREATMENT SERVICE
FISCAL YEAR 2003-2004
THE HELP GROUP**

BILLED SERVICES

Objective

Determine whether The Help Group provided the services billed in accordance with their contract with DMH.

Verification

We selected 12,344 service minutes from 387,709 service minutes that The Help Group billed DMH for December 2003 and January 2004 and reviewed the participant files for documentation to support the services billed. We also reviewed 15 service half-days from 1,017 service half-days, and 10 service full-days from 555 service full-days billed by The Help Group during the same period.

Results

We noted instances where The Help Group over billed DMH and instances where it did not sufficiently document the services provided. Specifically, we noted the following:

Over Billings

The Help Group over billed DMH for 1,697 (14%) minutes of the 12,344 minutes sampled. The amount that The Help Group over billed DMH totaled \$3,689. The Help Group subsequently prepared a correcting adjustment for the over billings. Specifically, we noted the following:

- The Agency billed DMH for 1,380 minutes of Mental Health Services but the progress note indicated that they provided only 23 minutes of Mental Health Services. The Agency indicated that its data entry staff incorrectly billed DMH for 23 hours (1,380 minutes) rather than 23 minutes which resulted in an over billing of 1,357 minutes.
- The Agency incorrectly billed DMH for 490 minutes of Case Management Service instead of 480 minutes as documented in the progress note. The Agency attributed the 10 minute over billing to a data input error.
- The Agency billed DMH for 330 minutes of Case Management Services but the progress note stated that the therapist “supervised” a client and siblings while the client’s mother received a haircut and went out to lunch. The DMH contract prohibits billing for assistance with daily living.

Insufficient Documentation

The Help Group also did not fully document 5,487 minutes (44%), 15 half-days (100%), and six full-days (60%) billed to DMH. Specifically, we noted the following:

- For 3,240 minutes billed where more than one staff was present during an intervention, the progress note did not describe the specific contribution of each staff person, as required by the County contract.
- For 1,333 minutes, seven half-days, and six full-days billed, the progress note did not describe what was attempted and/or accomplished by the client or service staff, as required by the County contract.
- For five half-days and six full-days billed, the Agency did not document one contact per month with a legally responsible adult, as required by the County contract.
- For 914 minutes and 15 half-days billed, the Agency did not document the activity/procedure code on the progress note, as required by the County contract.

It should be noted that the total half-days and full-days in the above examples exceed the number of billings sampled because some of the support that The Help Group provided for the billings had more than one deficiency. The amount of services that The Help Group did not sufficiently document totaled \$15,800.

Recommendations

The Help Group management:

- 1. Maintain sufficient documentation to support its billings to DMH.**
- 2. Implement controls to detect and correct over-billings that may occur.**

CLIENT VERIFICATION

Objectives

Determine whether the program participants actually received the services that The Help Group billed DMH and whether participants were eligible to receive services.

Verification

We sampled 10 program participants and interviewed their parent or legal guardian to confirm that the participants are clients of The Help Group and that they received the services that the Agency billed DMH. We also reviewed documentation in the participant files to determine whether participants were eligible to receive services.

Results

Each parent or guardian we contacted indicated that his or her child was a client of The Help Group. Documentation in the case file supports the participants' eligibility. In addition, the individuals that we contacted stated they were satisfied with the services that The Help Group provided to the children.

Recommendations

There are no recommendations for this section.

STAFFING LEVELS**Objective**

Determine whether ratio requirements are consistent with the ratio requirements indicated in the County contract. Contractors are required to maintain a 1:12 ratio of the number of Qualified Mental Health Professional (QMHP) staff to the total number of clients in its Day Rehabilitation Program and maintain a 1:10 ratio for its Day Treatment Intensive Program. Persons who are not solely used to provide Day Rehabilitation or Day Treatment Intensive services shall not be included as part of the ratio calculation.

Verification

We selected 20 days that The Help Group billed DMH for the Day Rehabilitation Program and 5 days that The Help Group billed for the Day Treatment Intensive Program and reviewed the staff schedule, logs, participant files, and staff timecards for December 2003 and January 2004.

Results

We were unable to determine whether The Help Group maintains the ratio requirements of its Day Rehabilitation and Day Treatment Intensive Programs. Specifically, the Agency maintains a sign-in/out sheet to document its compliance with the ratio requirements but staff often does not indicate their time-in/out on the sign-in/out sheet. The timecards for these staff also do not indicate their start and end times. In addition, we noted one instance where staff signed the sign-in/out sheet but their timecard indicated that they did not work that day. Therefore, we could not determine the number of QMHP staff that was present during the entire program.

Recommendation

- 3. The Help Group management adequately document staffing of the Day Rehabilitation and Day Treatment Intensive Programs to ensure that it maintains the required staffing ratios.**

STAFFING QUALIFICATIONS

Objective

Determine whether The Help Group's staff meets the qualifications required by the DMH contract.

Verification

We selected 10 The Help Group treatment staff and reviewed each staff's personnel file for documentation confirming their qualifications. In addition, we reviewed the qualifications of each staff person that performed the service in our sample of billed services.

Results

Each staff sampled possessed the required education, work experience, and licensure identified in DMH's contract.

Recommendations

There are no recommendations for this section.

SERVICE LEVELS

Objective

Determine whether The Help Group's reported services for Fiscal Year (FY) 2003-04 did not significantly vary from contracted service levels identified in the DMH contract.

Verification

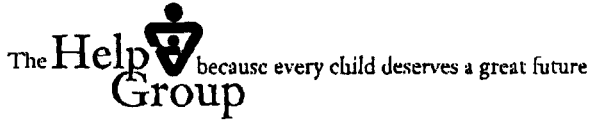
We obtained a report of EPSDT billings from the State Explanation of Balances (EOB) data for FY 2003-04 and compared it with the Agency's total EPSDT contracted level of service identified in the contract for the same period.

Results

Our review of recorded payments by DMH disclosed that the Agency's actual service levels did not significantly vary from its contracted service levels. For FY 2003-04, The Agency's contracted service level for EPSDT funded services was approximately \$6.6 million and the actual EPSDT funded services paid through October 2004 was approximately \$5.8 million (88%). The Help Group management indicated that it is in the process of claiming additional FY 2003-04 services and expects to utilize much of the remaining EPSDT funds.

Recommendations

There are no recommendations for this section.



Administrative Offices
13130 Burbank Boulevard
Sherman Oaks, California 91401
Tel: 818.781.0360
Fax: 818.988.4089
www.thehelpgroup.org

Summit View School
Village Glen School
Young Learners Therapeutic Preschool
& Early Intervention Center
Sunrise School for Autism & Developmental Disabilities
Pacific Ridge School
The Help Group & Family Center
Project Six
The Help Group - UCLA Neuropsychology Program
The Help Group - UCLA Center for Autism

Campuses: Culver City • Sherman Oaks
Valley Glen • Van Nuys

December 7, 2004

J. Tyler McCauley
Los Angeles Auditor Controller
500 West Temple, Room 525
Los Angeles, California 90012

RE: The Help Group Contract Review

Dear Mr. McCauley:

The Help Group Child and Family Center has reviewed the auditor-controller's contract monitoring report for services evaluated during the months of December 2003 and January 2004, and appreciated the opportunity to respond to some of the audit exceptions and recommendations.

1. Recommendation: Maintaining Sufficient Documentation to support its billing to DMH.

The agency acknowledges that it billed for multiple staff and that we did not document each staff person's involvement in the context of the mental health needs of the individual. The agency is committed to fulfilling the contractual demands of the Department of Mental Health. Staff will be trained on clearly documenting within the progress notes, weekly and daily summary sheets, the interventions and goal progress for each service provided. More specifically, the agency will continue to train staff to write notes utilizing the GIRP format.

The auditor noted that for five half days and six full days billed, the agency did not document one contact per month with a legally responsible adult as required by the county contract.

The Help Group Child and Family Center's day rehabilitation programs have ongoing contact with families. In our after school REACH programs, staff transports the child home each day and therefore have daily contact with the family. The Help Group will continue to ensure that family involvement is documented at least monthly.

The auditor noted that for 914 minutes and 15 half-days billed, the agency did not document activity/procedure codes on the progress notes as required by the county contract. The Help Group acknowledges that the activity codes for services rendered

should be on all DMH documentation including progress notes, psychiatrist billing, and day rehabilitation services. However, the sign in sheets for day rehabilitation and the psychiatrist notes clearly indicate that the services were provided; that the clients met medical necessity, and evidenced impairment in functioning. To prevent an out of compliance exception with recommendations for remediation, a series of cross checks will be instituted to ensure that the codes are listed on all services provided. The agency will continue to provide trainings on the use of activity codes for appropriate billings and documentation.

2. Recommendation: To implement controls to detect and correct over billings that may occur.

For 1,357 minutes, the agency billed DMH for 1,380 minutes of mental health services, but the progress notes indicated that the Help Group only provided 23 minutes of mental health services. The agency indicated that its data entry staff incorrectly billed DMH for 23 hours (1,380) minutes rather than 23 minutes.

For 10 minutes, the agency incorrectly billed DMH for 490 minutes of case management services instead of 480 minutes as documented in the progress note. The agency attributed the 10 minute over billing as a data input error.

For 330 minutes, the agency billed DMH for Case Management services, but the progress notes stated that the therapist "supervised a client and siblings while the client's mother received a haircut and went out to lunch.

The agency acknowledges that the billings for the aforementioned activities were key punch errors. The agency will continue to train staff to double check units of service reported on the billing sheets against the progress notes to ensure that the units of services billed to DMH-MIS are accurate. The billing staff will verify information entered into the system before submitting a claim. Furthermore, clinical supervisors and Quality Assurance Reviewers upon review of the documentation will match activity codes, and billings with the progress notes.

In response to the 330 minutes that the agency billed for case management services while the client's mother received a haircut and went out to lunch; the rendering provider was providing appropriate case management services, but did not adequately document the advocacy and linkage. The WRAP around Program is a shift in perspectives when it comes to the needs of the clients and service delivery. WRAP around dictates unconditional commitment and support for the family as well as the provision of resources for them to accomplish their goals. WRAP specifically focuses on supporting the family and not directing them to goal attainment. The Solis bill was specifically worded so that families had choices about how the system could meet their needs. The Help Group will be more specific in its language to follow the mandates for case management documentation as defined in the Department of Mental Health Manual. Staff will be trained and notes cross checked for clarity in the provision of services.

3. Recommendation: The Help Group Management adequately document staff of the day rehabilitation and day treatment intensive programs to ensure that it maintains the required staffing ratios.

The Help Group maintains sign in/sign out logs, for the staff and the students (depending upon age) in our day treatment programs. The times were not consistently evident for the times the staff or the children signed in or out. The Help Group Child and Family Center is revising our time records so that time in and time out per program will be clearly delineated.

Should you have any questions please contact Michael Love at (818) 779-5131.

Sincerely,



Susan Berman
Executive Vice President